

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ANNE CHANA HENKIN, Individually and as
Personal Representative of the ESTATE OF
JUDAH HERZEL HENKIN, ADERET
RIVKAH HENKIN STERN, ELIASHIR
ELIJAH HENKIN, JACOB BECHORSHALOM
HENKIN, JOSEPH GIL HENKIN, TAAMA
FREIDA HENKIN YAAKOVSON, MIRIAM
FULD, Individually, as Personal Representative
of the ESTATE OF ARI YOEL FULD, and as
the Natural Guardian of N.S.F. (a minor),
NAOMI FULD, TAMAR GILA FULD,
ELIEZAR YAKIR FULD, HARVEY JONAS
YONAH FULD, MARY ALICE FULD,
DANIEL YAAKOV FULD, EYTAN FULD, and
HILLEL CHAIM SHLOMO FULD,

Plaintiffs,

v.

QATAR CHARITY, QATAR NATIONAL BANK
and MASRAF AL RAYAN,

Defendants.

Case No. 21-cv-5716 (AMD) (VMS)

Oral Argument Requested

**QATAR NATIONAL BANK'S NOTICE OF
MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Rule 12 of the Federal Rules of Civil Procedure, and upon Qatar National Bank's Memorandum of Law in Support of Its Motion to Dismiss Plaintiffs' Complaint, Defendant Qatar National Bank Q.P.S.C. ("QNB") hereby moves this Court for an order dismissing the Complaint, and for such other and further relief as this Court may deem just and proper. QNB will appear before the Honorable Ann M. Donnelly, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and time to be designated by the Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order entered by the Court on February 16, 2022, Plaintiffs shall file their opposition by May 3, 2022, and QNB shall file its reply by May 17, 2022.

Dated: March 18, 2022

Respectfully submitted,

/s/ Michael G. McGovern

Michael G. McGovern

Douglas Hallward-Driemeier (*pro hac vice*)

ROPES & GRAY LLP

1211 Avenue of the Americas

New York, New York 10036-8704

Telephone: (212) 596-9000

Facsimile: (212) 596-9090

michael.mcGovern@ropesgray.com

douglas.hallward-driemeier@ropesgray.com

*Counsel for Defendant Qatar National Bank
(Q.P.S.C.)*